

**STATE OF ILLINOIS**  
**ILLINOIS COMMERCE COMMISSION**

Illinois Commerce Commission	)	
On Its Own Motion	)	
	)	
vs.	)	
	)	
Union Electric Company	)	
d/b/a AmerenUE	)	Docket No. 02-0729
	)	
Reconciliation of revenues	)	
collected under gas	)	
adjustment charges with	)	
actual costs prudently incurred.	)	

**MOTION FOR PROTECTIVE ORDER**

COMES NOW Union Electric Company d/b/a AmerenUE ("AmerenUE") and pursuant to 220 ILCS § 5/4-404, and 83 Ill. Admin. Code § 200.430, moves the Hearing Examiner to enter a Protective Order in the above-captioned case to protect the confidential nature of certain information and data contained in direct testimony and schedules filed concurrently herewith on behalf of AmerenUE as follows:


1. In accordance with the procedural schedule established in this case, AmerenUE is filing on this day its direct testimony and schedules. The direct testimony of one of its witnesses, James J. Massmann, contains confidential information consisting of the details of specific gas supply, transportation and storage transactions negotiated with particular gas suppliers and interstate pipeline companies. AmerenUE has filed both a highly confidential version of the testimony and a public redacted version of the testimony, utilizing the Commission's e-Docket system.

2. The public disclosure of the above referenced confidential information would adversely affect AmerenUE's relationships with the gas suppliers and pipelines it utilizes to acquire gas for its customers, and place AmerenUE at a significant competitive disadvantage when negotiating future gas supply arrangements. Therefore, there is a valid need to institute safeguards to protect such information from public release. AmerenUE requests that such safeguards be maintained in place for the five-year maximum period permitted under 83 Ill. Admin. Code § 200.430.

WHEREFORE, for the foregoing reasons, AmerenUE respectfully requests that the Hearing Examiner issue a Protective Order with a five year expiration date applicable to the information designated confidential in the direct testimony and schedules of James J. Massmann filed today in this proceeding.

Respectfully submitted,

UNION ELECTRIC COMPANY  
d/b/a AmerenUE

By   
Thomas M. Byrne  
Associate General Counsel

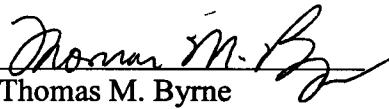
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Dated: April 2, 2003

**CERTIFICATE OF SERVICE**

This is to certify that a copy of the foregoing Motion For Protective Order in Docket No. 02-0729 was served on the following via electronic mail this 2nd day of April 2003:

Theresa Ebrey  
Illinois Commerce Commission  
527 E. Capitol Avenue  
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Thomas M. Byrne